

TUVΦΗΑΪΟΕΡΒΟΪ
Kevin H. Sharp

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA

v.

CRUZ ALEJANDRO AVENDANO

|
| No. 3:13-cr-00114
| Judge Sharp
|

MOTION TO LATE-FILE SPEEDY TRIAL WAIVER

Comes now undersigned counsel and hereby respectfully moves the Court to extend the deadline it had previously set for counsel to file the speedy trial waiver in this case. For cause, counsel would offer the following:

- (1) Previously, undersigned counsel notified the Court that he had no opposition to his codefendant's Motion to Continue the Trial (docket entry 59). Counsel anticipated filing a speedy trial waiver by Tuesday, January 21, 2014.
- (2) The Court granted a continuance motion, but conditioned the continuance upon Mr. Avendano's filing of a speedy trial waiver by today, January 21, 2014 at noon. (docket entry 60).
- (3) Undersigned counsel emailed a request to transport the Defendant to the United States Marshall's lockup in the United States Courthouse for today, so that he might comply with the Court's order.
- (4) The Marshalls brought the wrong Defendant to lockup. Specifically, Mr. Avendano's brother (also Mr. Avendano) was brought in in place